

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

CRIMINAL No. 04-10384-PBS

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UNITED STATES

v.

DANIEL KAMEN

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**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE**

Daniel Kamen, defendant in the above-captioned criminal case, hereby moves this Honorable Court to modify his conditions of release so that his mother may teach her violin students, including minors, in their home. In support of this motion, the defendant states:

1. When he was originally released by Magistrate Judge Cohen, the defendant was permitted to reside with his mother, on the condition that no minors visit the home at any time.
2. Mrs. Kamen is a violin teacher, and teaches people from age five to adulthood. Since the defendant's release, she has arranged to teach her minor students outside the home.
3. Mrs. Kamen is very concerned about the defendant's mental health at this time, following his conviction. She is worried that if she is out of the house for any extended period of time, the defendant will commit suicide. He has tried to commit suicide five times. Two of the attempts – at a casino in Connecticut and in Lexington a year ago (which resulted in a five day stay at Lahey Clinic) – were quite serious.
4. The defendant is not a risk to any children. Mrs. Kamen reports that when she teaches the violin to a child, she is present with the child, and the child's parent is also present and taking

part in the lesson. There is no indication in the defendant's offense that he poses a risk to children.

For the foregoing reasons, the defendant requests that the conditions of release be modified so that his mother can teach children at their home.

Respectfully submitted,  
**DANIEL KAMEN**  
By his attorneys,

/s/ Charles W. Rankin  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 2, 2006.

/s/ Charles W. Rankin  
Charles W. Rankin